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**Attorneys for Defendant, Progressive
 Casualty Insurance Company**

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

JAEVINH QUAN NGUYEN, individually,

Plaintiff,

CASE NO: 2:24-cv-02006-GMN-NJK

vs.

PROGRESSIVE CASUALTY INSURANCE
 COMPANY, a foreign Corporation; DOES 1
 through 10; ROE ENTITIES 11 through 20,
 inclusive, jointly and severally,

Defendants.

CORRECTED
**STIPULATION AND ORDER TO
 DISMISS EXTRACONTRACTUAL
 (BAD FAITH) CLAIMS; TO CAP
 DAMAGES AND REMAND TO
 NEVADA STATE COURT**

Counsel for Plaintiff, BETSY C. JEFFERIS-AGUILAR, ESQ. of HICKS & BRAISIER,
 PLLC and counsel for Defendant, RYAN L. DENNETT, ESQ. of DENNETT WINSPEAR, LLP
 hereby enter the following statements and stipulations before this court:

BACKGROUND

1. This matter was filed in Nevada State Court on August 1, 2024;
2. Defendant filed a Petition for Removal to Federal Court on October 24, 2024
 (Doc. 1);
3. On November 13, 2024, Defendant filed its Statement Regarding Removal
 (Doc. 6) – no other proceedings have occurred in the Federal action;
4. The parties desire to stipulate to remand this matter to Nevada State Court
 (Eighth Judicial District) for further proceedings. Thus, the parties stipulate as follows:

...

STIPULATIONS

1. It is hereby stipulated that Plaintiff is dismissing her second cause of action for breach of the implied covenant of good faith and fair dealing and her third cause of action for violation of Nevada's unfair claims practices act, with prejudice;

2. It is further stipulated that the value of Plaintiff's remaining cause of action (first cause of action) for breach of contract, does not and shall not ever exceed the federal jurisdictional threshold amount of \$75,000;

3. Based on those stipulations, counsel for the parties agree and stipulate further that this matter be remanded to Nevada State Court for all further proceedings.

DATED this 30th day of December, 2024

HICKS & BRASIER, PLLC

By /s/ Betsy C. Jerreris-Aguilar
 BETSY C. JERRERIS-AGUILAR, ESQ.
 Nevada Bar No. 12980
 2630 S. Jones Blvd.
 Las Vegas, Nevada 89146
 Telephone: 702-628-9888
Attorneys for Plaintiff,
Jaevinh Quan Nguyen

DATED this 2nd day of January, 2025.

DENNETT WINSPEAR, LLP

By /s/ Ryan L. Dennett
 RYAN L. DENNETT, ESQ.
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 3301 N. Buffalo Drive, Suite 195
 Las Vegas, Nevada 89129
 Telephone: 702-839-1100
Attorneys for Defendant, Progressive
Casualty Insurance Company

ORDER

UPON STIPULATION OF COUNSEL AND GOOD CAUSE APPEARING,
 IT IS SO ORDERED.

DATED: January 3, 2025


 U.S. DISTRICT COURT CASE

Theresa Amendola

From: Betsy Aguilar <baguilar@lvattorneys.com>
Sent: Monday, December 30, 2024 9:26 AM
To: Ryan Dennett
Cc: 65f519d3e+matter1776868129@maildrop.clio.com; Theresa Amendola
Subject: Re: Nguyen, Jaevinh

Hi Ryan,
I hope you had a restful and relaxing holiday! I apologize for the delay here, stip looks great and you have my approval to file. Thank you again for preparing this.

[REDACTED]

Hope you and your family are doing well!!!

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From: Ryan Dennett <rdennett@dennettwinspear.com>
Sent: Monday, December 23, 2024 9:13:04 AM
To: Betsy Aguilar <baguilar@lvattorneys.com>
Cc: 65f519d3e+matter1776868129@maildrop.clio.com <65f519d3e+matter1776868129@maildrop.clio.com>; Theresa Amendola <tamendola@dennettwinspear.com>
Subject: RE: Nguyen, Jaevinh

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Betsy,

Merry Christmas week! Here is a stip to dismiss the extracontractual allegations, limit total value and to remand to state court. Please let me know if have changes, or if you are in agreement and we can affix your signature.

Alternatively, I have some direction to see if we can just get the case done. Do you want to discuss that, and avoid the stipulation altogether?

Ryan

Ryan L. Dennett, Esq.



From: Betsy Aguilar <baguilar@lvattorneys.com>
Sent: Monday, December 16, 2024 6:34 AM
To: Ryan Dennett <rdennett@dennettwinspear.com>